

I'm commenting on the ARRL's response to the "one vanity application per applicant per day" proposal.

Background: Previously, an applicant could make same-day changes to an application online, but the current FCC online mechanism does not allow for same-day changes. Vanity applications are prioritized by "receipt date", so submitting an application on the first day a vanity callsign becomes available is important to a large percentage of applicants. Since a subsequent-day amendment resets the "receipt date", the current amendment process is not sufficient to allow an applicant to change a vanity application (eg, to correct errors) without in effect incurring a penalty with respect to other applicants. So, many applicants just file another application to correct errors.

Briefly, the ARRL proposes that multiple filers on the same day, be penalized by having ALL of their applications discarded. This proposal might have merit if the FCC system allowed same-day changes to applications. However, given the current FCC online filing system, a better proposal for the time being is for the FCC to only accept the LATEST same-day application from an applicant.